

**Kramer Levin**

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October 25, 2024

**VIA ECF AND EMAIL**

The Honorable Valerie E. Caproni, U.S.D.J.  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007  
CaproniNYSDChambers@nysd.uscourts.gov

**MEMO ENDORSED**

Re: *Tiger Mines New York, Inc. v. Tether Holdings Limited et al.*,  
No. 1:24-cv-05905 (VEC)

Dear Judge Caproni:

Defendants Tether Holdings Limited, Tether Operations Limited, Tether Limited, and Tether International Limited (collectively, “**Defendants**”) respectfully request that the Court (i) extend Defendants’ time to respond to Plaintiff Tiger Mines New York, Inc.’s Complaint (Dkt. No. 1) until and including November 13, 2024; and (ii) adjourn the Initial Pretrial Conference scheduled for November 15 to November 22 or December 6, 2024.

This would be the second extension of Defendants’ time to respond to Plaintiff’s Complaint and the second adjournment of the Initial Pretrial Conference. The current deadline for Defendants to respond to the Complaint is October 30, 2024. The Initial Pretrial Conference is currently scheduled for November 15, 2024. Plaintiff takes no position on Defendants’ request.

Defendants are requesting this extension of 14 days to respond to the Complaint and an adjournment of the Initial Pretrial Conference because the parties believe that they have agreed on the key terms of a resolution, but the parties require additional time to finalize an agreement.

Respectfully submitted,

Barry H. Berke

cc: Eric Hui-Chieh Huang, Esq. (via ECF)  
Ge Li, Esq. (via ECF)  
Katherine Lemire, Esq. (via ECF)  
Kevin Kerveng Tung, Esq. (via ECF)

Application GRANTED. Defendants deadline to answer or otherwise respond to the Complaint is EXTENDED from Wednesday, October 30, 2024, to **Wednesday, November 13, 2024**. The Initial Pretrial Conference scheduled for Friday, November 15, 2024, at 10:00 A.M. is ADJOURNED to **Friday, November 22, 2024, at 10:00 A.M.** The pre-conference deadline to submit a joint letter and proposed case management plan is extended until **Thursday, November 14, 2024**.

SO ORDERED.



10/28/24

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE